

1 Shahrar Milanfar (SBN 201126)  
2 [smilanfar@bkscal.com](mailto:smilanfar@bkscal.com)  
3 Alex P. Catalona (SBN 200901)  
4 [acatalona@bkscal.com](mailto:acatalona@bkscal.com)  
5 BECHERER KANNETT & SCHWEITZER  
6 1255 Powell Street  
Emeryville, CA 94608  
Telephone: (510) 658-3600  
Facsimile: (510) 658-1151

7 Attorneys for Defendant  
8 PRECISION VALVE & AUTOMATION, INC.

9 UNITED STATES DISTRICT COURT  
10 CENTRAL DISTRICT OF CALIFORNIA  
11

12 RUBEN JUAREZ, an individual and  
13 ISELA HERNANDEZ, an individual,

14 Plaintiffs,

15  
16 PRECISION VALVE &  
17 AUTOMATION, INC., a corporation  
and DOES 1-20,

18  
19 Defendants.  
20

CASE NO. CV17-03342-ODW (GJSX)  
[L.A.S.C. Case No. BC650229]

**DECLARATION OF LYNETTE  
DHILLON IN SUPPORT OF  
DEFENDANT PRECISION VALVE &  
AUTOMATION, INC.'S MOTION FOR  
SUMMARY JUDGMENT**

Date: September 24, 2018

Time: 1:30 p.m.

Ctrm: 5D, 5<sup>th</sup> Floor

Judge: Hon. Otis D. Wright II

\*This motion is made following the  
conference of counsel pursuant to L.R. 7-3  
which took place on July 16, 2018. (Catalona  
Dec., ¶ 57, Ex. 57.)

\*\*Defendant requests oral argument on this  
motion for summary judgment.

1  
2  
3 I, Lynette Dhillon, declare,

4 1. I have personal knowledge of the following facts and could competently  
5 testify to those facts if called as a witness.

6 2. I am currently employed as a Human Resources Compliance Manager  
7 with Space Exploration Technologies Corp., known as "SpaceX," in Hawthorne,  
8 California. I started working at SpaceX on July 11, 2011, and have held the following  
9 positions: (1) Human Resources Manager (7/11/11-1/26/14), (2) Human Resources  
10 Compliance Manager (1/26/14-present). As the Human Resources Manager, my  
11 responsibilities consisted of employee relations, employee engagement, performance  
12 management, and compliance. As the Compliance Manager, I advise on company  
13 policies, administer the Drug and Alcohol Policy, monitor the Compliance Hotline,  
14 conduct investigations, administer Affirmative Action compliance and government  
15 reporting, and assist the legal team.

16 3. During my employment with SpaceX, I have also periodically served as a  
17 Custodian of Records in litigation which is a role I have performed in this case. I have  
18 reviewed the records referred to herein, which SpaceX produced in response to  
19 subpoenas in this action, entitled Ruben Juarez and Isela Hernandez v. Precision Valve  
20 & Automation, Inc., et al., Case No. CV17-03342-ODW (GJSx). Based both on the  
21 knowledge and experience I have gained in my various roles at SpaceX and on my  
22 knowledge of how these records were created, stored, located or generated, and  
23 produced, I am aware that these records were made at or near the time of the  
24 statements, acts and events that are reported or contained in the records by persons with  
25 knowledge of and a business duty to record those matters. These records are kept in  
26 the course of SpaceX's regularly conducted business activities and made as a regular  
27 practice and custom of the business.

28 4. Attached hereto as Exhibit 90 is a true and correct copy of a document

-1-

DECLARATION OF LYNETTE DHILLON IN SUPPORT OF DEFENDANT PRECISION VALVE &  
AUTOMATION, INC.'S MOTION FOR SUMMARY JUDGMENT

Becherer  
Kannett &  
Schweitzer

1255 Powell St.  
Emeryville, CA  
94608  
510-658-3600

1 produced by SpaceX in this matter which is bates stamped JUAREZ v PVA SPX 1235 to  
 2 JUAREZ v PVA SPX 1236. This document is from SpaceX's human resources  
 3 department and accurately reflects Ruben Juarez's hire date, dates of employment, dates  
 4 actually spent working at SpaceX, the dates of Ruben Juarez's leave, and his final date  
 5 working at SpaceX which was March 26, 2014.

6 5. SpaceX periodically provides relevant training to its employees. SpaceX  
 7 has used various third-party software to manage its training program, and the software is  
 8 able to record the training courses that each SpaceX employee takes, including when the  
 9 employee completed the training. I was able to review the courses that Ruben Jaurez took  
 10 as part of the training he received as a SpaceX employee, as well as the dates when he  
 11 completed those courses. This table accurately reflects the records that SpaceX has  
 12 maintained regarding Mr. Juarez's training:

Course Name	Completed
Avionics ESD Awareness Training	1/23/2012
ESD Control Plan Training	12/3/2013
FOD Awareness Training	1/23/2012
FOD Awareness Training 2013	12/19/2013
Hawthorne Fire Safety	1/20/2012
Hawthorne FOD Awareness Training	1/23/2012
Hawthorne Personal Protective Equipment	1/23/2012
Hazard Communication Training	1/20/2012
Hazard Communication Training 2013	12/17/2013
Industrial Ergonomics Training	1/21/2014
Injury and Illness Prevention 2013	1/24/2014
ITAR Training 2010	1/23/2012
ITAR Training 2012	4/20/2013
ITAR Training V4	1/21/2014
Office Ergonomics Training	12/29/2013
Personal Protective Equipment 2013	12/3/2013
SpaceX Fire Safety 2013	12/4/2013
Waste Awareness Training 2013	12/26/2013

Becherer  
Kannett &  
Schweitzer

1255 Powell St.  
Emeryville, CA  
94608  
510-658-3600

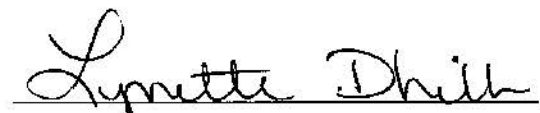


6. Attached hereto as Exhibit 91 is a true and correct copy of a document produced by SpaceX in this matter which is bates stamped JUAREZ v PVA SPX 2044 to JUAREZ v PVA SPX 2074. This document contains portions of power point slides and presenter dialogue from the "Hazard Communication Training" course that, according to SpaceX's records, Ruben Juarez completed on January 20, 2012.

7. Mr. Juarez also took a later version of this course entitled "Hazard Communication Training 2013" which, according to SpaceX's records, Ruben Juarez completed on December 17, 2013. In order to complete both of these courses, Ruben Juarez was required to take and pass a multiple choice test covering the topics presented in each course.

8. Attached hereto as Exhibits 75-77 are true and correct copies of portions of three different revisions of a SpaceX document used by the Avionics department entitled "Avionics Standard Operating Procedure: Polymeric Application on Electronic Assemblies." These documents were produced in response to a subpoena in the above captioned action. As shown on the cover page of these documents, Exhibit 75 is Revision A, dated June 7, 2012, Exhibit 76 is Revision B, dated August 17, 2012, and Exhibit 77 is Revision C, dated May 17, 2013.

9. I declare under penalty of perjury under the laws of the United States of America that the foregoing facts are true and correct. Executed on August 1, 2018 in Hawthorne, California.



Lynette Dhillon

Becherer  
Kannett &  
Schweitzer

1255 Powell St.  
Emeryville, CA  
94608  
510-658-3600